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Schreiber & Zindel Treuhand Anstalt.  
Frank O. Zindel, Engelbert Schreiber, Sr.  
and Engelbert Schreiber, Jr.*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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*This document relates to:*

*Estate of O'Neill, et al. v. The Republic of Iraq, et al., Case No. 04 CV 1076 (RCC)  
(S.D.N.Y.)*

*Estate of O'Neill, et al. v. Al Baraka, et al., Case No. 04 CV 1923 (RCC) (S.D.N.Y.)*

**DECLARATION OF ENGELBERT SCHREIBER, JR. IN SUPPORT OF THE MOTION  
TO DISMISS OF SCHREIBER & ZINDEL TREUHAND ANSTALT, FRANKO.  
ZINDEL, ENGELBERT SCHREIBER, SR., AND ENGELBERT SCHREIBER, JR.**

Engelbert Schreiber, Jr. declares and states:

1. I am a citizen of the Principality of Liechtenstein, and I reside at Kirchstrasse 37,  
Vaduz, Liechtenstein.

2. I make this Declaration in support of the Motion to Dismiss the O'Neill Plaintiffs' Second Amended Complaints in each of the above-referenced actions against Defendants Schreiber & Zindel Treuhand Anstalt, Frank O. Zindel, Engelbert Schreiber, Sr., and Engelbert Schreiber, Jr.

3. I have personal knowledge of the matters set forth in this Declaration. If called as a witness in any proceeding, I would be able to testify as to these matters.

4. I graduated from Collegium St. Antonius in Appenzell, Switzerland in 1982.

5. Following two years of legal studies at the University of Fribourg in Switzerland, I worked in the brokerage department of Verwaltungs-und Privat-Bank Vaduz in Liechtenstein. In 1987 I passed the examination for admission as a professional trustee in Liechtenstein, and from 1987 to 1990 I worked as a portfolio manager at S.T.A. Salmann Trust Aktiengesellschaft in Vaduz. I became one of the founders of Schreiber & Zindel Treuhand Anstalt in 1990 and have been a principal in the firm since then.

6. I understand that Frank Zindel has signed a Declaration in support of our motion to dismiss and that he has described the organization of the firm and its business activities. I add only that I am authorized to act on behalf of the firm under certain circumstances.

7. Since 1988 I have traveled to the United States six times. In 1988 I came to the United States for three months for an extended vacation and to learn English. During that time I spent one week in New York. In 1989 I spent approximately three weeks in California on vacation. In 1992 I spent two or three weeks in Florida on my honeymoon. In 1994 I traveled to Houston on business for a few days, but I was not there as a representative of Schreiber &

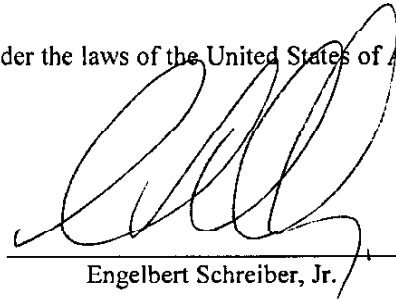
Zindel. In either 1996 or 1997 I spent a one-week vacation in Florida. Lastly, in 1998 I spent one week in New York to watch the US Tennis Masters.

8. On my behalf I have never directly or through an agent:
- (a) solicited, operated, conducted, or carried on business in the State of New York or anywhere else in the United States;
  - (b) had or maintained an office or place of business in the State of New York or anywhere else in the United States;
  - (c) employed or authorized an agent or employee to transact business within the State of New York or anywhere else in the United States on my behalf;
  - (d) entered into any contracts to be performed in the State of New York or anywhere else in the United States;
  - (e) received or contracted to receive services to be performed in the State of New York or anywhere else in the United States (but for the retention of Schiff Hardin LLP for this litigation);
  - (f) owned, leased, used or possessed any real estate or other personal property within the State of New York or anywhere else in the United States;
  - (g) invested in the State of New York or anywhere else in the United States (other than investments I may have made in the securities of public companies);

- (h) maintained any bank or brokerage accounts in the State of New York or anywhere else in the United States;
- (i) filed any tax returns in the State of New York or anywhere else in the United States;
- (j) been licensed or registered to do business in the State of New York or anywhere else in the United States;
- (k) filed any suit in any court or availed myself of any right to commence legal action in the State of New York or anywhere else in the United States;
- (l) been subject or submitted to the jurisdiction of any court in the State of New York or anywhere else in the United States.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: May 20, 2005



Engelbert Schreiber, Jr.